

1 Terrence J. Coleman (State Bar No. 172183)
2 Brian H. Kim (State Bar No. 215492)
3 PILLSBURY & LEVINSON, LLP
4 The Transamerica Pyramid
5 600 Montgomery St., 31st Floor
6 San Francisco, California 94111
7 Telephone: (415) 433-8000
8 Facsimile: (415) 433-4816
9 Email: rgrey@pillsburylevinson.com
10 bkim@pillsburylevinson.com

11 Attorneys for Plaintiff,
12 ANTHONY RAMOS

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 ANTHONY RAMOS,

16 Plaintiff,

17 vs.

18 UNITED OF OMAHA LIFE INSURANCE
19 COMPANY,

20 Defendants.

Case No. C 12-3761 JST

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE CONTINUANCE OF CASE
MANAGEMENT CONFERENCE**

JOINT STIPULATION

21 Pursuant to Local Rule 6-2, Plaintiff Anthony Ramos and Defendant United of Omaha Life
22 Insurance Company hereby stipulate and agree as follows:

23 1. On June 6, 2013, the parties argued their cross-motions for judgment under Rule 52 of
24 the Federal Rules of Civil Procedure before the Court.

25 2. On June 25, 2013, the Court on its motion continued the June 26, 2013 Case
26 Management Conference to July 31, 2013.

27 3. From July 26, 2013 until August 9, 2013, Plaintiff's counsel will be in the East Coast on
28 a prepaid and previously reserved vacation and will therefore be unavailable for the currently
rescheduled July 31, 2013 Case Management Conference.

4. On June 26, 2013, Plaintiff's counsel contacted Defendant's counsel via telephone and informed him of Plaintiff counsel's unavailability from July 26, 2013 until August 9, 2013 and specifically for the July 31, 2013 Case Management Conference. Defendant's counsel stated that he will be unavailable on August 14, 2013 due to a prepaid and previously reserved vacation, but would be available on August 21, 2013 for a rescheduled Case Management Conference.

5. Good cause exists to continue the July 31, 2013 Case Management Conference, because Plaintiff's counsel will be in the East Coast on a prepaid and previously reserved vacation during that date. Plaintiff's counsel has met and conferred with Defendant's counsel and the parties have jointly determined that the parties would be mutually available to attend a rescheduled Case Management Conference on August 21, 2013.

6. WHEREFORE, the parties respectfully request that the Court continue the Case Management Conference currently scheduled for July 31, 2013 to **August 21, 2013**.

IT IS SO STIPULATED.

Dated: June 27, 2013

PILLSBURY & LEVINSON, LLP

By: /s/ Brian H. Kim
 Terrence J. Coleman
 Brian H. Kim
 Attorneys for Plaintiff,
 ANTHONY RAMOS

Dated: June 27, 2013

BARGER & WOLEN LLP

By: /s/ J. Russell Stedman
 J. Russell Stedman
 Brendan V. Mullan
 Attorneys for Defendant,
 UNITED OF OMAHA LIFE INSURANCE
 COMPANY

///

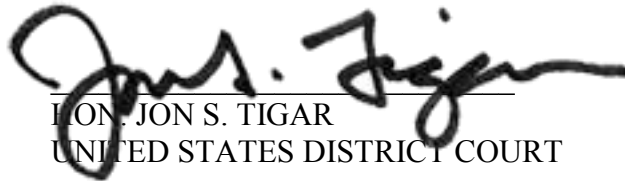
///

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation above, and with good cause appearing therefore,
IT IS HEREBY ORDERED that the Case Management Conference currently scheduled for July 31,
2013 shall be continued to **August 21, 2013 at 2:00 p.m.**

IT IS SO ORDERED.

DATED: June 28, 2013



HON. JON S. TIGAR
UNITED STATES DISTRICT COURT